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Attorneys for Defendant  
6 SIEMENS PRODUCT LIFECYCLE MANAGEMENT  
SOFTWARE INC.  
7 (formerly known as UGS CORP.)

8  
9 IN THE UNITED STATES DISTRICT COURT FOR THE  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN FRANCISCO/OAKLAND DIVISION

12 VANESSA FLINT, Individually and On Behalf  
of All Others Similarly Situated,

13 Plaintiffs,

14 v.

15 UGS CORPORATION and DOES 1 through  
16 100, inclusive,

17 Defendants.

Case No. C 07 4640 MJJ

(Removed from San Francisco Superior  
Court on September 7, 2007; Case  
No:CGC-07-465695)

**DECLARATION OF JOHN  
CHRISTOPHER BROSZ IN SUPPORT  
OF MOTION TO TRANSFER VENUE**

Date: December 4, 2007  
Time: 9:30 a.m.  
Courtroom: 11, 19<sup>th</sup> Floor  
Judge: Hon. Martin J. Jenkins

20  
21 I, John Christopher Brosz, hereby declare as follows:

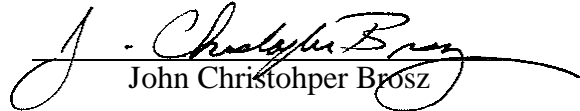
22 1. I am the Vice-President of Technical Operations for Siemens Product Lifecycle  
23 Management Software Inc. ("Siemens PLM Software"). I have personal knowledge of the  
24 matters stated herein and if called as a witness could and would competently testify  
25 thereto. I have worked as the Vice-President of Technical Operations for 6 years. As the  
26 Vice-President of Technical Operations my duties include management of the Technical  
27 Operation Group, indirectly including its applications engineers, within the Products &  
28



1 Operations Organization of Siemens PLM Software

2 2. As Vice-President of Technical Operations, I am generally familiar with the  
3 duties of applications engineers who work for Siemens PLM Software in the State of  
4 California. There are only three applications engineers who work for Siemens PLM  
5 Software in Northern California. None of the applications engineers who work for  
6 Siemens PLM Software in Northern California perform technical writing duties. None of  
7 the applications engineers who work for Siemens PLM Software in Northern California  
8 write instructional material for print or onscreen media or other instructional material  
9 intended to be read by customers.  
10

11  
12 Executed this 12<sup>th</sup> day of November, 2007, at Cypress, California. I declare under penalty  
13 of perjury under the laws of the State of California and the United States of America that the  
14 foregoing, to the best of my knowledge, is true and correct.  
15

16   
17 John Christopher Brosz  
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**CERTIFICATE OF SERVICE**

**CASE:** Vanessa Flint v. UGS Corporation  
**CASE NO.:** USDC-NDCA : C 07 4640 MJJ  
**CLIENT:**

I, xxxxxx, declare that I am employed with the law firm of Jackson, Lewis, whose address is 199 Fremont Street, 10th Floor, San Francisco, California, 94105; I am over the age of eighteen (18) years and am not a party to this action.

On November 12, 2007, I served the attached document(s):

**DOCUMENT TITLE**

in this action by placing true and correct copies thereof, enclosed in sealed envelope(s) addressed as follows:

Robert C. Schubert, Esq.  
Juden Justice Reed, Esq.  
Miranda P. Kolbe, Esq.  
Schubert & Reed LLP  
Three Embarcadero Center, Suite 1650  
San Francisco, CA 94111  
Telephone: 415.788.4220  
Facsimile: 415.788.0161

☐ **BY MAIL:** United States Postal Service by placing sealed envelopes with the postage thereon fully prepaid, placed for collection and mailing on this date, following ordinary business practices, in the United States mail at San Francisco, California.

☐ **BY HAND DELIVERY:** I caused such envelope(s) to be delivered by hand to the above address.

☐ **BY OVERNIGHT DELIVERY:** I caused such envelope(s) to be delivered to the above address within 24 hours by overnight delivery service.

☐ **BY FACSIMILE:** I caused such documents to be transmitted by facsimile to the telephone number(s) indicated above.

I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on November 12, 2007, at San Francisco, California.



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Mary Stoner